

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

MARY DALTON and EMIL ADOLPHSON,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

OLD SECOND BANCORP, INC., OLD
SECOND NATIONAL BANK, EMPLOYEE
BENEFITS COMMITTEE OF OLD
SECOND BANCORP, INC., J. DOUGLAS
CHEATHAM, JAMES ECCHER, WILLIAM
B. SKOGLUND, ROBERT DICOSOLA,
JEFF WEST, STEWART BEACH and DOES
1-10.

Defendants.

CASE NO. 1:11-cv-01112

Honorable Judge Milton I. Shadur

**AGREED MOTION FOR EXTENSION OF PAGE LIMITS RELATED TO
PLAINTIFFS' FINAL APPROVAL AND FEE MEMORANDA**

Plaintiffs Mary Dalton and Emil Adolphson ("Plaintiffs"), and Defendants Old Second Bancorp, Inc., Old Second National Bank, Employee Benefits Committee of Old Second Bancorp, Inc., J. Douglas Cheatham, James Eccher, William B. Skoglund, Robert DiCosola, Jeff West, Stewart Beach and Does 1-10 ("Defendants"), (collectively, the "Parties"), by and through their undersigned attorneys, respectfully request to file (1) a Memorandum in Support of Plaintiffs' Motion for Final Approval of Settlement, Modification of Class Definition for Settlement Purposes, and Approval of Plan of Allocation ("Final Approval Memorandum"), and (2) a Memorandum in Support of Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards ("Fee Memorandum"), in excess of the fifteen (15) page limit set forth in Local Rule 7.1.

In support of the instant motion, Plaintiffs state they intend to file by no later than May 14, 2013, a Final Approval Memorandum that addresses many complex and varied issues that require detailed explanation and citation, including explanation of the fairness of the proposed settlement, the responses received by Plaintiffs' Counsel to the settlement, if any, and explanation of the proposed plan of allocation of the settlement.

Additionally, Plaintiffs intend to file by no later than May 14, 2013, a Final Fee Memorandum that will address, in addition to the proposed settlement in this action, the fairness and reasonableness of the fees requested by Plaintiffs' Counsel as well as the requested reimbursement of expenses Plaintiffs' Counsel incurred in litigating the action and reaching the proposed settlement. Moreover, Plaintiffs intend to address the fairness and reasonableness of the requested case contribution awards sought for the Plaintiffs.

Given the inherent complexity of this action, and the requisite showing Plaintiffs must demonstrate to satisfy the standards for final approval of the settlement and approval of attorneys' fees and expenses, Plaintiffs require the additional requested pages to adequately address these issues. Defense Counsel does not oppose the relief sought by the instant motion.

WHEREFORE, Plaintiffs respectfully request leave of Court to file a Final Approval Memorandum and Fee Memorandum not in excess of thirty (30) pages each.

Agreed on this 5th day of April, 2013

/s/ Mark K. Gyandoh

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CERTIFICATE OF SERVICE

I, Mark K. Gyandoh, an attorney, hereby certify that on April 5, 2013, service of a copy of the foregoing *Agreed Motion for Extension of Page Limits Related to Plaintiffs' Final Approval and Fee Memoranda* was filed electronically with the Clerk of Court using the CM/ECF system, which will send electronic notification to the following:

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